

From: Dan Connally
To: ["Sablad, Elizabeth"](#); [Poentis, Kris T](#); [Lum, Darryl C](#)
Subject: RE: Comments on Kailua Regional WWTP predraft permit
Date: Wednesday, March 06, 2013 3:09:00 PM

Hey Kris,

I'll look these over and contact you early next week to discuss. I will make necessary revisions next week.

Thank you,

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From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Wednesday, March 06, 2013 3:08 PM
To: Poentis, Kris T; Lum, Darryl C
Cc: Dan Connally
Subject: Comments on Kailua Regional WWTP predraft permit

Hi Kris,

Here are our comments on the predraft permit for the Kailua Regional WWTP. One thing that I realized that should be changed within the Sand Island permit as well, is that mass-based limits should be included in addition to concentration-based limits for any nutrients that are limited in the permit. For the purpose of organization, I separated out comments that were repeats from the Sand Island draft.

Please let me know when you would like to discuss these comments.

Sincerely,
Elizabeth

Comments on Kailua Regional WWTP preliminary draft permit:

1. Mass-based limits (in addition to concentration-based limits) should be included for nutrients that have demonstrated RP.
2. The comment on page 3 indicates a design flow of 15.25mgd, but the permit is based on a flow of 12.7mgd. If the permit will be changed to be based on a flow of 15.25mgd, an antidegradation analysis is necessary.
3. Table F-5 should include the RPA for enterococcus (and possibly pH?).

4. Fact Sheet page 13: the list of pollutants for which there is no data includes pollutants which are not on the list in Appendix 1 of the permit. Which list is used for priority pollutants?
5. Fact Sheet page 16 includes two different MDELs for chlordane – is this a typo?
6. Fact Sheet page 17 includes an incorrect MDEL for dieldrin – is this a typo?
7. Recommend that antibacksliding justification for pollutants with new effluent limits state that they are new (which also means there is no backsliding).
8. Fact Sheet page 21: the paragraphs that explain both RP and WQBELs for enterococcus are unclear. Why is the WQS for the RPA different than the geometric mean effluent limit?
9. Can you explain how effluent limits are derived for nutrients? Is it strictly the WQS*dilution? If so, I am not coming up with the same numbers.

Similar to comments on Sand Island predraft:

10. The 10% triggers for nutrients should be changed to effluent limits per Hawaii's latest nutrient implementation approach. The fact sheet discussions for each nutrient should also reflect this change.
11. I recommend additional justification for the use of T. gratilla be included in the fact sheet in light of recent contested permits.
12. Page 36 includes MDL and ML requirements. Where did this language come from? It looks like California permit language...we should discuss whether this is applicable to Hawaii permits.
13. Fact Sheet, page 5 includes sentence that says the discharge regulated by the permit is not expected to contribute to impairment. This is a little too definitive. I recommend removal.
14. Fact Sheet page 21 should be clarified that EPA promulgated enterococcus criteria for Hawaii beyond the 300 meter mark and that these are applicable water quality standards. In addition to the geometric mean, a thorough explanation of which single sample maximum applies should be included.
15. Fact Sheet page 21 should explain the applicability of dilution for enterococcus.

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